

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

United States District Court  
Southern District of Texas  
FILED

JAN 29 2025

Nathan Ochsner, Clerk

ROSALINDA MAGANA AND  
ARTURO MAGANA-PAREDES

v.

TRISMART SOLAR LLC,  
JUAN WINSTON CURLING,  
FRONTLINE HOME SOLUTIONS LLC,  
and SUNLIGHT FINANCIAL, LLC,

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CIVIL ACTION NO. 7:24-cv-00384

**FRONTLINE HOME SOLUTIONS LLC'S ORIGINAL ANSWER**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

Defendant, FRONTLINE HOME SOLUTIONS LLC, files this Original Answer to Plaintiffs' Amended Petition. Pursuant to Federal Rule of Civil Procedure 8(b), Defendant denies each and every allegation contained in Plaintiffs' Amended Petition except for those expressly admitted herein. In several instances, Defendant has identified statements in the Original Complaint that are legal conclusions or non-factual statements rather than factual assertions. No response to such legal conclusions or non-factual statements is required. However, if such response is required, Defendant denies such legal conclusions and non-factual statements. The headings and numbered paragraphs below directly correlate to the sections and numbered paragraphs of Plaintiffs' Amended Petition. Those titles and headings are reproduced in this Original Answer for organizational purposes only, and Defendant does not admit any matter contained in them.

Defendants respond to the specifically numbered allegations of the Complaint as follows:

1. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

2. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

3. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

4. Admit.

5. Admit.

6. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

7. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

8. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

9. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

10. Deny.

11. Deny.

12. Deny.

13. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

14. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.

15. Deny.

16. Deny.

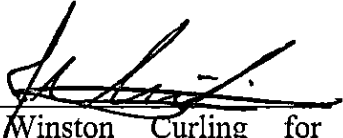
17. Deny.
18. Deny.
19. Deny.
20. Deny.
21. Deny.
22. Deny.
23. Deny.
24. Deny.
25. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.
26. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.
27. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.
28. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.
29. Deny.
30. Defendant lacks sufficient knowledge to admit or deny the allegations contained in this paragraph.
31. Deny.
32. Deny.
33. Deny.
34. Cannot admit or deny as this is a statement.

35. Deny.

**PRAYER**

For the foregoing reasons, Defendant asks the Court to enter judgment that Plaintiffs take nothing, dismiss Plaintiffs 'suit with prejudice, assess costs against Plaintiffs, and award Defendant all other relief that the Court deems appropriate.

Respectfully submitted,

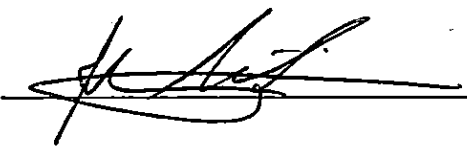
  
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Juan Winston Curling for Defendant  
FRONTLINE HOME SOLUTIONS LLC  
423 North 13<sup>th</sup> street  
Donna, Texas. 78537  
*Pro Se*

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on this 21<sup>st</sup> day of January 2025, a true and complete copy of the above and foregoing document was served on the following via electronic mail:

**Melissa Sue Gutierrez**  
Bradley Arant Boult Cummings  
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Houston, TX 77076

  
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**Juan Winston Curling, Defendant**  
***Pro Se***